

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X

Rekor Systems, Inc.

Plaintiff,

v.

No. 19-cv-7767(LJL)

**Notice of Dismissal of Action Against  
Additional Defendants on Counterclaims**

Suzanne Loughlin, Harry Rhulen and  
James Satterfield

Defendants

And

CrisisRisk Strategies, LLC

Additional Plaintiff  
On Counterclaims

v.

Robert A. Berman, Eyal Hen,  
James K. McCarthy, Paul A. de Bary,  
Glenn Goord, Christine Harada, David  
Hanlon, Richard Nathan, Steven  
D. Croxton, Firestorm Solutions, LLC,  
and Firestorm Franchising, LLC

Additional Defendants  
On Counterclaims

-----X

WHEREAS, in their answer, filed on February 28, 2020, defendants asserted claims in Counterclaims 4 and 6 as against Additional Defendants on Counterclaims Robert A. Berman, Eyal Hen, James K. McCarthy, Paul A. de Bary, Glenn Goord, Christine Harada, David Hanlon, Richard Nathan, and Steven D. Croxton (collectively, “Additional Defendants on Counterclaims”), and

WHEREAS, the only claims asserted in the action against the Additional Defendants on Counterclaims are those claims alleged in Counterclaims 4 and 6, and

WHEREAS, the Additional Defendants on Counterclaims have moved the Court, pursuant to Fed. R. Civ. P. 12 (b) (2) and (6) for an Order dismissing Counterclaims 4 and 6, now

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 41(a) (1) (A) (i) and (c), that Defendants hereby dismiss the action as against the Additional Defendants on Counterclaims.

Dated: April 6, 2020

Respectfully submitted,



---

John J. D. McFerrin-Clancy, Esq  
17 State Street, 40<sup>th</sup> Floor  
New York, NY 10004  
646.771.7377

And

Robert C. Boneberg, Esq.  
43 Madison Avenue  
Maplewood, NJ 07040  
[bonebergesquire@gmail.com](mailto:bonebergesquire@gmail.com)  
973.886.6576

*Attorneys For Defendants  
And Additional Plaintiff on  
Counterclaims*